

Exhibit A

Jaeger Affidavit

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et al.

Debtors.

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X

Chapter 11

Case No. 08-13555 (JMP)

(Jointly Administered)

**AFFIDAVIT OF RAYMOND JAEGER IN SUPPORT OF THE MOTION OF
EDGEWOOD MANAGEMENT LLC**

New York, New York)
) SS:
County of New York)

Raymond Jaeger duly swears, deposes and says:

1. I am Head Trader at Edgewood Management LLC ("Edgewood") and I make this affidavit in support of Edgewood's motion, on behalf of its client Edgewood Growth Fund ("EGF"), for an order directing Lehman Brothers Holdings Inc. ("Lehman") to release and return \$505,936.13 of EGF's cash that is not part of Lehman's estate and is being held as an open item in a Lehman bank account at Bank of America.

2. Unless stated otherwise, I make this affidavit based on my personal knowledge of the facts stated herein, which is based on information provided to me by traders employed by Edgewood; EGF's custodian bank, US Bank; EGF's subscription bank, UMB

Bank; and EGF's transfer agent, DST.¹

3. Edgewood is an investment advisory firm located in New York, New York. Edgewood, on behalf of its client EGF, engaged in certain financial transactions involving Lehman and Lehman Brother Inc. ("LBI") prior to their bankruptcy filing, including the Vestas Trade (as defined below) that led to the events that precipitated this Motion.

4. On July 29, 2008, Edgewood and LBI agreed that LBI would sell 3,928 shares of stock of Vestas Wind Systems (the "Vestas Shares") that Edgewood was holding for EGF for \$505,936.13 (the "Vestas Trade"). The Vestas Trade was scheduled to settle on August 1, 2008.

5. On August 1, 2008, EGF's custodian bank, US Bank, delivered the Vestas Shares to Lehman's clearing account at Bank of America.

6. On that same date, Edgewood instructed Lehman to send the \$505,936.13 sales proceeds to an EGF subscription account at UMB Bank. Although the account was an EGF account, the instructions were incorrect because the sales proceeds should have gone to the EGF custodian account at US Bank.

7. On August 5, 2008, Lehman wired \$505,936.13 from its Bank of America account to EGF's UMB Bank account (the "First Wire"), as it was instructed to do.

8. On August 7, 2008, UMB Bank rejected the First Wire and sent it back to Lehman's Bank of America account.

¹ Attached to the Motion are (1) Exhibit B, a true and correct copy of an E-mail chain from August 18, 2008 through August 27, 2008, and (2) Exhibit C, a true and correct copy of an e-mail chain from February 17, 2009 through March 2, 2009, each of which support the facts stated herein and set forth in the Motion.

9. On August 13, 2008, Lehman rejected UMB Bank's rejection of the wire and wired \$505,936.13 to EGF's UMB Bank account (the "EGF Cash"). UMB Bank retained the EGF Cash on behalf of EGF and began investigating how to apply it.

10. Subsequently, Edgewood realized that the EGF Cash was held by EGF's subscription bank, UMB Bank, and not its custodian bank, US Bank. To rectify this error, Julie Pandolfi, a trader at Edgewood, expressly asked Carmine Rullo, a trader at Lehman that assisted in the execution of the Vestas Trade on behalf of Lehman, to recall the wire and accept the EGF Cash back from UMB Bank in order to send the funds to EGF's custodian bank, US Bank, by using the instructions Janice Heldt of US Bank had provided.

11. Ms. Pandolfi's request on behalf of Edgewood to Mr. Rullo was for Lehman to accept the EGF Cash only in order to wire it back into EGF's custodian account at US Bank. Lehman was not authorized to use the EGF Cash for any other purpose.

12. Mr. Rullo, on behalf of Lehman, accepted the terms for receiving the EGF Cash from UMB Bank and acknowledged that Lehman would only accept the EGF Cash in order to transfer it to Edgewood's custodian account at US Bank.

13. On Friday, September 12, 2008, UMB Bank wired the EGF Cash to Lehman's Bank of America account. Lehman did not wire the EGF Cash back to EGF's custodian account at US Bank as it was instructed to do.

14. Upon information and belief, since September 12, 2008, the EGF Cash has been located in Lehman's Bank of America account, account number 6550-1-61536 and has been listed as an open item.

By: /s/ Raymond Jaeger
Raymond Jaeger

Sworn to before me this
29th day of November, 2010

s/ Suzanne I. Perdue
Suzanne I. Perdu

Notary Public, State of New York
No. 01PE6085728
Qualified in Nassau County
Commission Expires: December 31, 2010